

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
                                )  
Plaintiff,                 )  
                                )  
v.                             ) Case No. 4:14CR00175 AGF  
                                )  
                                )  
MARK PALMER, et al.        )  
                                )  
Defendants.                 )

**BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY**

The United States of America, the United States of America, by its attorney, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Jennifer A. Winfield, Assistant United States Attorney for said district, and pursuant to Federal Rule of Criminal Procedure 32.2(a), particularly alleges that the following property is subject to forfeiture on the basis of the forfeiture allegations set forth in the Indictment filed in the above-styled criminal case:

- (a) Approximately \$109,190.00 U.S. Currency;
- (b) Approximately \$7,780.00 U.S. Currency;
- (c) Approximately \$60,759.28 from a Bank of America, N.A. account ending in 3002;
- (d) Approximately \$137,416.16 from a Bank of America, N.A. account ending in 5622;
- (e) Approximately \$8,718.64 from a Bank of America, N.A. account ending in 7087;
- (f) Approximately \$16,200.50 from a Bank of America, N.A. account ending in 7676;
- (g) Approximately \$502.16 from a Bank of America, N.A. account ending in 7663;
- (h) Approximately \$92,280.33 from a Bank of America, N.A. account ending in 2715;
- (i) Approximately \$18,600.00 in proceeds from Bank of America, N.A. Cashier's Check #0981700203;
- (j) Approximately \$26,400.00 in proceeds from Bank of America, N.A. Cashier's Check #0981700204;

- (k) Approximately \$21,200.00 in proceeds from Bank of America, N.A. Cashier's Check #0981700205;
- (l) Approximately \$19,800.00 in proceeds from Bank of America, N.A. Cashier's Check #0981700206;
- (m) Approximately \$14,000.00 in proceeds from Bank of America, N.A. Cashier's Check #0981700207;
- (n) Approximately \$100,000.00 in proceeds from Kaskaskia Valley Credit Union Cashier's Check #4907;
- (o) 660 Erica Drive, Granite City, Illinois, more particularly described as:
  - Lot 94 in emerald meadows plat 3, a subdivision in the east half of section 15, township 3 north, range 9 west of the third principal meridian according to the plat thereof recorded in plat cabinet 62 page 145, (excepting therefrom the coal, gas, oil and other mineral rights conveyed, excepted or reserved in prior conveyances, if any) in Madison County, Illinois,
  - Parcel number 17-2-20-15-02-204-017;
- (p) The real property totaling approximately 21.13 acres located in the Carmi Township, White County, Illinois, more particularly described as:
  - Part of the West Half (W 1/2) of the Southwest Quarter (SW 1/4) of Section Twenty-two (22), Township Five (5) South, Range Nine (9) East of the Third Principal Meridian, in White County, Illinois and more particularly described as follows:
  - Commencing at an existing Two (2) inch diameter Iron Pipe found at the Southwest Corner of said West Half (W 1/2) of the southwest Quarter (SW 1/4) of Section 22-5-9; thence on an assumed bearing of North 00 degrees 00 minutes 00 seconds East along the West Line of said West Half (W 1/2) of the Southwest Quarter (SW 1/4) of Section 22-5-9 a distance of 1507.81 feet to a Spike Nail found in the center of County Road 900E on the Northwesterly Right-of-Way Line of Illinois Highway One (1) and this Point being the Point of Beginning; thence continuing North 00 degrees 00 minutes 00 seconds East along said center of County Road 900E and also along said West Line of the West Half (W 1/2) of the Southwest Quarter (SW 1/4) of Section 22-5-9 a distance of 1120.21 feet to an existing Railroad Spike found in the intersection of said County Road 900E and County Road 1350N at the Northwest Corner of said West Half (W 1/2) of the Southwest Quarter (SW 1/4) of Section 22-5-9; thence North 89 degrees 45 minutes 50 seconds East along the North Line of said West Half (W 1/2) of the Southwest Quarter (SW 1/4) of Section 22-5-9 and also along said County Road 1350N a distance of 1326.45 feet to an existing Spike Nail found at the Northeast Corner of said West Half (W 1/2) of the Southwest Quarter (SW 1/4) of Section 22-5-9; thence South 00 degrees 03 minutes 39 seconds East along the East Line of said West Half (W 1/2) of the Southwest Quarter (SW 1/4) of section 22-5-9 a distance of 327.38 feet to an existing Concrete Right-of-Way Marker found on

said East Line of the West Half (W 1/2) of the Southwest Quarter (SW 1/4) of Section 22-5-9 and this Point also being on said Northwesterly Right-of-Way Line of Illinois Highway One (1); thence along the following calls on said Northwesterly Right-of-Way Line; South 67 degrees 55 minutes 13 seconds West a distance of 194.68 feet; thence South 64 degrees 44 minutes 32 seconds West a distance of 402.00 feet; thence South 59 degrees 01 minute 54 seconds West a distance of 200.00 feet; thence South 44 degrees 41 minutes 50 seconds West a distance of 313.66 feet; thence South 56 degrees 01 minutes 32 seconds West a distance of 409.53 feet; thence North 77 degrees 36 minutes 57 seconds West a distance of 31.58 feet to an existing Concrete Right-of-Way Marker found on said Northwesterly Right-of-Way Line of Illinois Highway One (1); thence South 74 degrees 52 minutes 51 seconds West along said Northwesterly Right-of-Way Line of Illinois Highway One (1) a distance of 20.94 feet to the Point of Beginning, containing 21.13 acres, more or less.

Except any interest in the coal, oil, gas and other minerals underlying the land which have been heretofore conveyed or reserved in prior conveyances, and all rights and easements in favor of the estate of said coal, oil, gas and other minerals, if any.

Parcel number 13-22-300-007;

- (q) Assorted carrier and packaging materials, including, but not limited to:
  - i. 122 empty retail packages with various names and sizes,
  - ii. 62 digital scales, 5 commercial heat sealers,
  - iii. 7 packaging/flat boxes used to ship the products,
  - iv. 54 bags of unused carrier material, and
  - v. 26 boxes of unused carrier materials.
- (r) Approximately \$176,911.00 U.S. Currency; and
- (s) Approximately \$293,450.00 in the form of the judgment and damages owed to Charles Wolfe in Missouri Circuit Court Cause No. 1511-CC01054.

Respectfully submitted,

RICHARD G. CALLAHAN  
United States Attorney

/s/ Jennifer A. Winfield  
JENNIFER A. WINFIELD, #53350MO  
Assistant United States Attorney  
111 South 10th Street, Suite 20.333  
Saint Louis, Missouri 63102

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on May 9, 2016, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all counsel of record.

*/s/ Jennifer A. Winfield*

JENNIFER A. WINFIELD, #53350MO  
Assistant United States Attorney